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Proposed Counsel for the Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

TGI Friday's Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-80069-sgj11

(Joint Administration Requested)

AGENDA FOR FIRST DAY HEARINGS
ON NOVEMBER 4, 2024 AT 11:00 A.M. CENTRAL TIME

TGI Friday's Inc. and its affiliated debtors and debtors in possession (each a "Debtor" and collectively, the "Debtors") hereby file their agenda for hearings on **Monday, November 4, 2024 at 11:00 A.M. Central Time**, before the Honorable Stacey G.C. Jernigan, U.S. Bankruptcy Judge

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: TGI Friday's Inc. (7117); TGI Friday's NY, LLC (2281); TGIF Holdings, LLC (7999); TGIF Midco, Inc. (7296); TGIF Parent, Inc. (1781); Burlington Towne Crossing, Inc. (7501); T G I Friday's of Greenbelt, Inc. (5617); T G I Friday's of Towson, Inc. (5450); T G I Friday's of Wisconsin, Inc. (7600); T.G.I. Friday's Marketing Advisory Council (6527); T.G.I. Friday's of Charles County, Inc. (3516); T.G.I. Friday's of Frederick County, Inc. (2547); T.G.I. Friday's of Harford County, Inc. (0072); T.G.I. Friday's of Washington County, Inc. (6174); TGI Friday's of Annapolis, Inc. (8315); TGI Friday's of Howard County, Inc. (0119); TGI Friday's of Rockville, Inc. (2004); TGI Friday's of Texas LLC (3931); TGI Friday's of the Rockies, Inc. (7885); TGIF/DFW Manager, LLC (N/A); TGIF/DFW Partner, LLC (N/A); TGIF/JDC Restaurant Development, LLC (N/A); WEBCO Products Incorporated (3014). The Debtors' service address is 19111 North Dallas Parkway, Suite 200, Dallas, TX 75287.

for the Northern District of Texas (the “Hearing”). The Debtors will ask the Court to consider the following:

I. Matters to be Heard:

A. *Debtors’ Emergency Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 2]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 30];
- b. *Certificate of Conference Regarding Debtors’ Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- i. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

B. *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 3]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 30];
- b. *Certificate of Conference Regarding Debtors’ Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

C. *Debtors' Emergency Motion for Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* [Docket No. 14]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

D. *Debtors' Emergency Application for Entry of an Order Authorizing the Employment and Retention of Stretto Inc. as Claims, Noticing and Solicitation Agent Effective as of the Petition Date* [Docket No. 10]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

E. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, and (III) Granting Related Relief [Docket No. 5]*

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 28];*
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions [Docket No. 29];*
- c. *Notice of First Day Hearings [Docket No. 27]; and*
- d. *Certificate of Service [Docket No. ##] (to be filed prior to hearings).*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

F. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Docket No. 13]*

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 28];*
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions [Docket No. 29];*
- c. *Notice of First Day Hearings [Docket No. 27]; and*
- d. *Certificate of Service [Docket No. ##] (to be filed prior to hearings).*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

G. *Debtors' Emergency Motion for Entry of an Order (I)(A) Approving Debtors' Proposed Form of Adequate Assurance of Payment for Future Utility Services, (B) Approving Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Docket No. 12]*

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 28];*
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions [Docket No. 29];*
- c. *Notice of First Day Hearings [Docket No. 27]; and*
- d. *Certificate of Service [Docket No. ##] (to be filed prior to hearings).*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

H. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 15]*

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 28];*
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions [Docket No. 29];*
- c. *Notice of First Day Hearings [Docket No. 27]; and*
- d. *Certificate of Service [Docket No. ##] (to be filed prior to hearings).*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

I. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; (II) Authorizing Continuation and Renewal of Surety Bond Program; and (III) Granting Related Relief [Docket No. 6]*

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 28];*
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions [Docket No. 29];*
- c. *Notice of First Day Hearings [Docket No. 27]; and*
- d. *Certificate of Service [Docket No. ##] (to be filed prior to hearings).*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

J. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to Pay Prepetition Wages, Employee Benefits (A) Obligations, and Other Compensation and (B) Continue Employee Benefits Programs and Pay Related (C) Administrative Obligations, and (II) Grant Related Relief [Docket No. 11]*

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 28];*
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions [Docket No. 29];*
- c. *Notice of First Day Hearings [Docket No. 27]; and*
- d. *Certificate of Service [Docket No. ##] (to be filed prior to hearings).*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

K. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief* [Docket No. 20]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

L. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and PACA/PASA Claimants (I) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests, and (III) Granting Related Relief* [Docket No. 18]; and

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

M. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Rejection of Certain Contracts and Nonresidential Real Property Leases, (II) Abandoning Certain Personal Property, and (III) Granting Related Relief* [Docket No. 7]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

N. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases and (II) Granting Related Relief* [Docket No. 9]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- b. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- c. *Notice of First Day Hearings* [Docket No. 27]; and
- d. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

O. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief* [Docket No. 17, 19]

i. Related Documents:

- a. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief* [Docket No. 26];
- b. *Declaration of Kyle Richter, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 28];
- c. *Certificate of Conference Regarding Debtors' Emergency First Day Motions* [Docket No. 29];
- d. *Notice of First Day Hearings* [Docket No. 27]; and
- e. *Certificate of Service* [Docket No. ##] (to be filed prior to hearings).

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The motion and proposed order have been transmitted to Elizabeth Young at the Office of the U.S. Trustee and there is no objection to entry of the proposed order as filed.

II. Witness and Exhibits Lists:

A. Debtors' Witness and Exhibit List on First Day Hearings [Docket No. 32]

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The Debtors reserve the right to amend this *Notice of Agenda* as appropriate.

Dated: November 3, 2024

Respectfully submitted by:

/s/ Holland N. O'Neil

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Proposed Counsel to the Debtors

CERTIFICATE OF SERVICE

I certify that on November 3, 2024, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Zachary C. Zahn

Zachary C. Zahn